



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

December 16, 1991

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 3  
Response to Notice of Deviation Associated  
with Inspection Report 50-249/91029  
NRC Docket Nos. 50-249

- Reference: (a) W.D. Shafer letter to Cordell Reed dated  
November 15, 1991 transmitting NRC Inspection  
Report 50-249/91029
- (b) T.J. Kovach to J. Lieberman dated May 17, 1991  
transmitting Commonwealth Edison Company's Response  
to Notice of Violation and Proposed Imposition of  
Civil Penalty

Dear Sir:

Enclosed is Commonwealth Edison Company's (CECo) response to the subject  
Notice of Deviation which was transmitted with the referenced letter and  
Inspection Report (Reference a). The Notice of Deviation was regarding a  
deviation from commitments which were made in previous correspondence  
(Reference b) associated with a Severity Level III violation.

If there are any questions or comments regarding this response, please  
contact Rita Radtke, Compliance Engineer, at (708) 515-7284.

Sincerely,

*A. L. Barnes for*

T.J. Kovach  
Nuclear Licensing Manager

Attachment

cc: A. Bert Davis, Regional Administrator, Region III  
B.L. Siegel, Project Manager, NRR  
W. Rogers, Senior Resident Inspector, Dresden

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RESPONSE TO NOTICE OF DEVIATION

INSPECTION REPORT 50-249/91029

During an NRC inspection conducted on September 23 through October 11, 1991, a deviation of your corrective actions as stated in your response to violation 50-237/91006-01 was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the deviation is listed below:

The letter to Mr. J. Lieberman, Director of the Office of Enforcement, NRC, from Mr. T. J. Kovach, Nuclear Licensing Manager, Commonwealth Edison, in response to violation (50-237/91006-01), stated that existing maintenance procedures will be reviewed for adequacy of bolting instructions as they are incorporated into work packages.

Contrary to the above, maintenance procedure, DMP 0200-10, "Removal and Installation of Unit 2/3 Main Steam Safety Valves," was not reviewed for adequacy in bolting instructions prior to the incorporation into and performance of work package NWR D96848, "Main Steam Safety Valve Repairs."

REASONS FOR THE DEVIATION:

Work packages were being reviewed for adequacy of bolting practices. In Work Package D96848, the bolting instructions followed the recommendations of the gasket manufacturer, Flexatatic. For Flexatatic gaskets, a compression or crush criteria is usually specified to assure an adequate seal. The torque requirements specified by the valve manufacturer do not necessarily provide adequate assurance that the flange will remain sealed at operating pressures. Maintenance procedure DMP 200-10, did specify "checking gasket compression with a feeler gauge;" however, a compression criterion was not specified. The compression criteria for the various sizes of Flexatatic gaskets are obtained in the vendor manual and are used by the mechanics in the performance of tightening activity. CECO agrees that the deviation occurred, in that no documentation was produced which provided evidence that the review occurred.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

In Work Package D96848, the requirements for bolting in DMP 200-10 were augmented with additional instructions in Temporary Change Request 91-271 which provided a 680 foot-pound torque requirement, as recommended by the safety valve vendor. Final assurance of adequate flange sealing will be obtained during the Reactor Coolant System hydrostatic test, which will be performed prior to unit startup.

The Mechanical Maintenance Department performed a study comparing the torque required to provide the crush recommended by the gasket vendor with the 680 foot-pound torque recommended by the safety valve vendor. Results indicated that minimum acceptable compression is achieved at this value. The past practice of "slugging" the bolting had achieved preloads well above the minimum recommended value of acceptable compression as defined in Nuclear Operations Directive (NOD) MA.16, "Good Bolting Practices". Future use of DMP 200-10 will rely upon the original bolting instructions, augmented by a quantitative compression criterion.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS:

Dresden Station has completed a comprehensive "Work Analyst's Guide to Work Package Preparation." Chapter 5, "Prepare Work Instructions," includes references to EPRI NP-5067, "Good Bolting Practices," and NOD MA.16, "Good Bolting Practices." The following statement is included:

If the bolting techniques specified in the work instructions differ from those called for in the manufacturer's technical manuals (i.e., gasket crush instead of bolt torque), the reason for this deviation will be documented.

Appendix B, "Work Analyst's Work Package Preparation Checklist," will be completed and retained for each work package. Section V.c includes the following check-offs to assure good bolting practices have been considered.

Torquing/bolting requirements are clearly defined?

Torquing/bolting techniques are in accordance with vendor recommendations?

If No, state reason: \_\_\_\_\_

The Work Analyst's Guide was implemented on December 9, 1991. This commitment will remain in effect until the maintenance procedures have been revised to incorporate NOD MA.16 requirements.